

Alan R. Ackerman, Esq. (AA9730)  
Law Offices of Alan R Ackerman  
1719 Route 10 East, Suite 106  
Parsippany, NJ 07054  
(973) 898-1177  
araesq@alanackermanlaw.com  
Attorney for Plaintiff

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

KASHMIR GILL, Individually,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Case No. 3:19-cv-06742-FLW-TJB
	:	
JUS BROADCASTING CORP; JUS PUNJABI,	:	
LLC; JUS ONE, CORP.; JUS BROADCASTING	:	
CORP. PVT LTD; and PENNY SANDHU	:	
	:	
Defendants.	:	

**PLAINTIFF'S VERIFIED APPLICATION FOR  
ATTORNEY'S FEES AND COSTS**

Plaintiff, Kashmir Gill, by and through his undersigned attorney, hereby submits Plaintiff's Verified Application for Attorney's fees and costs, and as grounds therefore state as follows:

1. I am an attorney at law in the State of New Jersey and counsel for Plaintiff, Kashmir Gill, in the within action. I have been practicing law since 1974.

2. I execute this Verified Application in support of my request for attorney's fees based upon the failure of Defendants' counsel to appear at the return date of Defendants' Notice of Motion to Dismiss Plaintiff's Complaint pursuant to *Fed. R. Civ. P. 12(b)(2) and 12(b)(s)* [Docket Entry 10].

3. Defendants filed the aforesaid Motion on April 25, 2019. Following the filing of

Plaintiff's response in opposition to Defendants' Motion on May 20, 2019 [Docket Entry 13], and the filing of Defendants' reply Brief on June 3, 2019 [Docket Entry 16], the Court set oral argument for July 10, 2019 at 10:00 a.m. The notice of oral argument appears on the Court Docket on June 12, 2019. The complete civil docket is annexed as **Exhibit "A."**

4. On July 9, 2019, I prepared for oral argument for the following day. On July 10, 2019, I left my home in West Orange at 8:00 a.m. and arrived at the U.S. District Court in Trenton at approximately 9:45 a.m. At approximately 9:55 a.m., Your Honor's Court clerk asked if Defendants' counsel had arrived. The Court clerk came into the hallway again at 10:10 a.m. and at 10:20 a.m. with the same query.

5. At 10:25 a.m., I was invited into Chambers where I participated in a telephone conference with an associate in Defendants counsel's law firm who advised Defendants' counsel Michael Farhi, Esq. was in Hudson County trying another case and was unaware of the oral argument. After further conversation, the Court rescheduled oral argument for Friday, July 19, 2019 at 10:30 a.m. I then left the Courthouse and arrived at my office at 12:15 p.m.

6. As all attorneys are aware, dairying scheduled Court appearances are the responsibility of counsel of record and the firm calendar coordinator.

7. I make this Application requesting counsel fees and costs incurred primarily for the time expended, to and from the U.S. District Court, and the costs which I incurred.

- a. The time and services expended were required to fulfill my legal representation;
- b. My fee charged is customarily charged in this County for similar legal services performed by attorneys of commensurate qualifications; and
- c. The fee charged is reasonable for the work involved.

8. My rate is \$450.00 per hour, which is reasonable in view of my expertise, the work efforts supplied and the fees generally charged in this area for these types of services.

9. On July 9, 2019, I reviewed the file for one hour to prepare for oral argument.

10. On July 10, 2019, I spent 4 hours and 15 minutes traveling from my home to the U.S. Courthouse in Trenton and returning to my office in Parsippany inclusive of the time expended awaiting the arrival of Defendants' counsel at the Courthouse. I am requesting attorney's fees of \$1,806.25 for my efforts on this date.

11. The distance from my home in West Orange to the U.S. District Courthouse in Trenton is 65 miles traveling via Route 280 to the Garden State Parkway and then to the NJ Turnpike. The distance returning to my office in Parsippany via Route 1 and Route 287 North is 62 miles, for a total of 127 miles. Mileage expenses authorized by 28 U.S.C. §1821(c)(2) mileage allowance and FR Doc. 2018-27789 is \$0.58 per mile. Therefore I am requesting mileage reimbursement of \$73.66. I am also requesting reimbursement for tolls in the amount of \$2.90.

12. I am requesting attorney's fees of \$2,362.50 for the time expended on July 9, 2019 and July 10, 2019 as set forth above. I am requesting reimbursement of travel expenses of \$76.56. The total amount of attorney's fees and reimbursement of travel expenses which I request is \$2,439.06.

LAW OFFICES OF ALAN R. ACKERMAN

Dated: July 17, 2019

BY: \_\_\_\_\_

  
ALAN R. ACKERMAN, ESQ.